



The International Food & Beverage Alliance Comments on the UN Decade of Action on Nutrition's Proposed Priority Actions for 2021-2025

The International Food & Beverage Alliance welcomes the opportunity to participate in the online consultation on the UN Decade of Action on Nutrition 2016-2025 (the “Decade”).

A sustainable food system lies at the heart of the SDGs. As leading food and non-alcoholic beverage companies, we recognize the responsibility we have to help create a sustainable food future – one that delivers food security and safe and nutritious foods for all people, eliminates food loss and waste and encompasses sustainability across economic, social and environmental dimensions at every stage of the food value chain.

We support the overall aim of the Decade's Work Programme to provide a clearly defined, time-bound operational framework for governments to adopt and implement nutrition-related initiatives to create sustainable food systems and enabling environments that promote healthy dietary practices and accelerate implementation of the ICN2 commitments and achievement of the diet-related NCD targets by 2025 and the SDGs by 2030.

The current consultation asks for feedback on a set of proposed focus areas for priority action for 2021-2025 within the six Action Areas of the Decade's Work Programme. Following are our comments on Action Areas 1, 3, 5 and 6:

Action Area 1: Sustainable, resilient food systems for healthy diets

- *Scale up inclusion of nutrition objectives in food and agriculture policies:* increase production of context-appropriate fruits and vegetables for domestic consumption, and of legumes and pulses that contribute to healthy diets; raise production of oils in support of the elimination of industrially produced trans fat in the food supply.

We support actions for sustainable food systems that promote healthy and safe diets and strategies that integrate nutrition objectives into food and agriculture policies and strengthen local food production and processing.

As part of our commitment on product formulation and innovation, in addition to reducing salt, sugar and fat and eliminating industrially produced trans fat, we are working to increase ingredients considered beneficial for good health - vegetables, fruits, fibre-rich grains, pulses, nuts and seeds. To meet the ever-increasing consumer demand for products that are healthier for people and the planet, we are launching plant-based meat and dairy alternatives. In May 2019, we aligned our earlier commitment to phase out industrially produced trans fat from our products with the WHO's objective to eliminate industrially produced trans fat from the global food supply by 2023. As of May 2021, the



majority of our members have already reached the target. Based on our experience, the proposed action to increase the production of healthier oils in support of the elimination of industrially produced trans fat is a critical element towards achieving this goal.

We would also propose an additional priority action: to increase the production and consumption of fortified foods. IFBA members are working to alleviate undernutrition and reduce the risk of malnutrition by fortifying products with essential micronutrients, delivering hundreds of billions of servings of micronutrient-fortified foods and beverages. Food fortification or nutrient enhancement is widely recognized as among the most impactful and cost-effective nutrition interventions, contributing essential nutrients to help prevent deficiencies and their associated health problems and reduce the risk of malnutrition in certain populations.

- *Accelerate food reformulation*: provide reference ranges for sodium reduction level benchmarks for processed foods.

We fully support a priority action to reduce sodium in processed foods. IFBA members have been working on sodium reduction strategies for many years – reformulating and innovating thousands of products containing lower sodium levels, providing nutrition information and labelling to help consumers identify the sodium content of the products they choose, raising consumer awareness of the impact of sodium on health and creating a demand for lower sodium products.

Reducing sodium levels is complex and challenging. A “one size fits all” approach to the development of sodium reduction benchmarks is difficult. The benchmarks must be grounded in technical, market and consumer realities and be based on an understanding of population-level salt intakes and food categories and channels that contribute to salt intake in different geographies.

If we are to achieve the WHO’s global target for a 30% salt intake reduction by 2025, sodium reduction strategies cannot only be limited to reducing sodium in processed foods. We would propose an additional priority action: to identify and address *all* sources of sodium in the diet and implement sodium reduction strategies across the full spectrum of the food industry supported by nutrition education campaigns designed to encourage consumer acceptance of lower sodium products.

Action Area 3: Social protection and nutrition education

- *Scale up the implementation of nutrition education interventions*: implement easily understandable nutrition (front-of-pack) labelling of food products that supports consumers’ choices for healthy diets.

We fully support this proposed action. The provision of nutrition information forms the cornerstone of any policy framework to address poor dietary intakes and to promote healthier eating habits.



We believe front-of-pack labelling is a valuable and complementary public health tool with the potential to encourage behavior change by helping consumers make informed dietary choices and improve their eating habits and stimulate product development and reformulation. IFBA members provide clear, objective, fact- and science-based nutrition information on our products, online and at point-of-sale. Globally, we have implemented an easy-to-understand approach to nutrition labelling to give consumers easy access to the amount of calories, sugar, sodium and other nutrients in each serving or portion and how each contributes to daily nutritional needs for a balanced, healthy diet. At the end of 2019, 99% of IFBA members' products display nutritional information on-pack; 97% display GDAs on-pack; and 94% display calories front-of-pack. In addition to our global commitment, IFBA members participate in regional and national voluntary front-of-pack labelling initiatives around the world.

Action Area 5: Safe and supportive environments for nutrition at all ages

- *Scale up the implementation of regulatory instruments to promote healthy diets:* introduce taxation of sugar-sweetened beverages and subsidies for fruits and vegetables; implement legislation of marketing restrictions of foods and beverages high in fat, sugar and/or salt to children.

IFBA does not support this proposed action for several reasons. Firstly, while we do not oppose regulation per se, it is a question of what type of regulation is appropriate, proportionate and workable and what the ultimate impacts will be. There are many views as to the effectiveness of such measures on diet and health outcomes.

Secondly, taxes meant to discourage the consumption of a particular ingredient, or a particular product are known to have mixed results and can lead to unintended consequences and market distortions that can undermine the objective of the tax.

Thirdly, this proposed action fails to acknowledge the fact that government-led and industry-led voluntary initiatives on product reformulation and responsible marketing practices with regard to children (including IFBA's *Global Responsible Marketing Policy*, which applies in every country where IFBA members market their products and is aligned with the WHO *Set of Recommendations on food and non-alcoholic beverage marketing to children*) have proven to be very effective in improving the nutrition of products – reducing nutrients associated with public health risk and which may be overconsumed such as sugars, sodium and saturated fat; and eliminating industrially produced trans fat - and in improving the nutritional composition of products marketed to children. Today, foods marketed to children are lower in sugar, salt and fat and provide more whole grains, fibre, non-fat dairy, fruits and vegetables.

We would propose an alternative priority action to scale up reformulation and innovation efforts that increasingly make available food choices that help people eat healthy, balanced diets, supported by



actions to drive consumer acceptance and behavior change which are key enablers for successful reformulation strategies.

We will continue to champion efforts with local companies and across the broader industry to improve the standards on marketing to children through voluntary initiatives. We recognize that success is dependent on ensuring the support of governments and key stakeholders and hope that our success to date will serve to make this an additional priority action.

Action Area 6: Strengthened governance and accountability for nutrition

- *Enhance political commitment through political dialogue and advocacy at national and sub-national levels: establish and strengthen coordination mechanism through a multistakeholder consultation process for the uptake of the CFS Voluntary Guidelines on Food Systems and Nutrition.*

We welcomed the multisectoral, science- and evidence-based approach the CFS has taken in developing the voluntary guidelines and believe that further multistakeholder dialogue is critical to the establishment of an appropriate coordination mechanism and achievement of the transformative change contemplated by the guidelines. We look forward to our continued engagement.

- *Scale up investments in national nutrition information system:* establish and strengthen a national nutrition monitoring framework in line with global guidance and the SDG monitoring framework in order to identify challenges and gaps for informed and effective policymaking.

Improved national nutrition data is needed. A coordinated and systematic process for monitoring and evaluating the impact of the priority actions is critical to assessing progress on the implementation of the SDGs. We support the establishment of a framework for identifying and sharing best practice models and increasing access to knowledge and innovations that will inform and enhance the effectiveness of proposed actions.

- *Accelerate global governance and accountability:* use global summits such as the UN Food Systems Summit 2021 and the Tokyo Nutrition for Growth Summit 2021 for setting new commitments for action on nutrition and streamlining the global nutrition accountability infrastructure.

Accountability and transparency are central to good governance. We support the need for a transparent mechanism for ensuring accountability for the commitments made. Given the number of reporting and accountability mechanisms already in place, we welcome the proposed action to streamline a global nutrition accountability infrastructure.

Key Cross-cutting Actions

Following are the key cross-cutting actions that we believe are critical to facilitating interlinkages between the six Action Areas and with the potential for improving nutrition:



Effective multistakeholder collaboration is key. Transforming food systems to combat malnutrition in all its forms and ensure healthy, sustainable diets for all will only be achieved if governments, civil society and the private sector work together in partnership. We are pleased that the Decade's Work Programme recognizes the contribution the private sector can make to transform agriculture and food systems. At the same time, we recognize that engagement with the private sector may present a challenge for some stakeholders. To accelerate and scale up progress, we will need to strengthen how we work together. We are convinced that much can be accomplished with an open exchange and transparent dialogue, collaborative agenda-setting and clarification of the role of the private sector in its contribution to creating a sustainable food system. Our collaboration with the WHO and RESOLVE to Save Lives to eliminate industrially produced trans fat from the global food supply has been recognized as a good model of public-private collaboration.

Nutrition crosses all sectors. Not only on food security and agriculture, but also on health, education, trade, finance and social and economic development. Success in achieving a food system that promotes healthy diets depends on cross-sectoral collaboration and policy coherence. It is essential that we enshrine not only the public health agenda, but the whole sustainable food systems agenda into a whole-of-society and whole-of-government approach.

Evidence-based strategies and Knowledge-sharing. We are encouraged that the Work Programme recognizes that actions taken by governments and other stakeholders must rely on the latest scientific evidence. We believe that all of the proposed actions must be science- and evidence-based. We need to understand what works and why and develop a coordinated mechanism to facilitate evidence-based processes and initiatives. Providing a comprehensive platform and repository for data collection and knowledge transfer, which maximizes stakeholders' complementary areas of expertise, capability and resources will deliver outcomes more efficiently and effectively than one party could do alone.

We are grateful for the opportunity to provide our comments and look forward to our continued participation as we all work to implement the priority actions for the second half of the Decade.

14 June 2021